



Universal Telecom, Inc.
P.O. Box 679
LaGrange, KY 40031

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2003 SEP 29 PM 1:52

2003 SEP 29 PM 2:46

T.R.A. DOCKET ROOM

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September 25, 2003

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket No. 03-00502
Workshop to Gather Information from the Telecommunications Industry Related to
Preventing Violations of TN Cod Ann. 65-21-114

1. **Describe the manner in which you are able to provide telecommunications service in compliance with Tennessee Code Ann. 65-21-114(a). If you do not currently take steps to ensure compliance with 65-21-114(a), explain your reason for not doing so.**

Universal Telecom services Tennessee end-user with flat rate service. There is not measured rate from point to point inside or outside of any county.

2. **Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114(a).**

N/A

3. **Provide a suggestion for how this workshop should proceed.**

Considering that Universal Telecom offers flat rate service only, and this workshop would not pertain to us, we have no suggestions.

If you have any questions or need any further information, please feel free to contact me at the address above.

Jennifer Hart

Intercarrier Relations and Compliance Manager

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NETWORK BILLING SYSTEMS

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2003 SEP 26 155 Willowbrook Blvd. Wayne NJ 07470 973-256-2020 Fax: 973-812-6600

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TN REGULATORY AUTHORITY

Ron Jones
Tennessee Regulatory Authority
460 Robertson Parkway
Nashville, TN 37243-0505

Dear Mr. Jones:

I am writing to you in response to your memo titled "Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. 65-21-114, Docket No. 0300502. My understanding is that this code indicates that any telephone call made between two points in the same county in Tennessee shall not be billed to any customer.

First, please understand that Network Billing Systems is a long-distance reseller with a nationwide presence. We are not a local carrier in Tennessee. As a long-distance carrier, NBS carries two types of domestic calls: interlata, and long-distance intralata. Once the local carrier hands off a call from our customer to one of our underlying long-distance carriers, the call will be billed to Network Billing Systems, and we will bill our customer. Neither NBS nor our underlying long-distance carrier can control what types of calls are handed off to us. This is controlled by the local carrier and by the customer's choice of carrier. It seems that you are attempting to have all intra-county calls classified as local, with no charge to the enduser. That means that the local carrier should carry the call using its own facilities, and should not hand the call off to a long-distance carrier.

Whether or not the local carrier hands off a call to a long-distance carrier is usually determined as follows:

Is the call interlata? If so, it is a long-distance call and should be handed off.

Is the call intralata? If so, are both ends of the call within the local calling area of the calling party as defined by the local carrier? If it is within the local calling area, then the call is NOT handed off. If it is not within the local calling area, the call is classified as intralata long-distance (sometimes called regional toll), and will be handled by the customer's choice of carrier for this type of call. This might be the local carrier, or it might be a long-distance carrier such as NBS.

Tennessee is comprised of five latas and many counties. I do not know if a lata boundary ever crosses a county line. Nor do I know if every local carrier's local calling area

includes the entire county for each customer. There may or may not be a problem here. My point is that NBS is in no position to solve the problem should there be one. Once we get a record of the call, there is no easy way for us to know if both ends of the call are in the same Tennessee county. The more fundamental issue is that as a long distance carrier we should not be getting such calls. They should be handled entirely by the local carrier.

We would suggest therefore that the Authority focus its attention on the local carriers and how they define their local calling areas.

Network Billing Systems is committed to providing high-quality long-distance service, competitive rates, clear and consistent billing, and first-class customer service. We take our responsibility for regulatory compliance seriously, and would be happy to help you in any way that we can. I hope this response has been helpful to you.

Feel free to contact me if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry Laskowski', with a stylized flourish at the end.

Larry Laskowski, Vice President

U-Dial of Tennessee, Inc.
800 E. Reelfoot Avenue, Suite 200
Union City, TN 38261
(731) 885-5888

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2003 SEP 29 PM 2:49

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September 25, 2003

Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

IN RE: Workshop to Gather Information from the Telecommunications
Industry Related to Preventing Violations of Tenn. Code Ann.
§ 65-21-114

Dear Ms. Tate:

Our company provides local exchange service through resale and through lease of UNE-P. Consequently, we rely on the underlying carrier to ensure compliance with TCA § 65-21-114.

If you need additional information, please contact me. Thank you.

Sincerely,



Ellis Falkoff

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September 24, 2003

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Chairman Deborah Taylor Tate
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville TN 37243-0505

RE: Docket No. 03-00502 Tenn. Code Ann. 65-21-114

Dear Chairman Tate:

NuVox Communications, Inc. in order to comply with the countywide local call requirement of the TRA, became a subscriber to the TAR code database.

If additional information is required, please do not hesitate to call me at (864) 331-8252.

With best regards,


Mary Campbell
Tariff Manager

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GLOBAL NAPS

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John O. Postl
Vice President of Regulatory Affairs
Assistant General Counsel
89 Access Road, Suite B
Norwood, MA 02062
(781) 551-9715
Fax: (781) 551-9984
email: jpostl@gnaps.com

September 24, 2003

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Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. §65-21-114

Dear Mr. Jones:

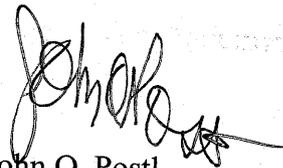
Global NAPS Gulf, Inc. hereby responds to the inquiries of your memo dated September 16, 2003 as follows:

Global NAPS Gulf is not currently providing service in Tennessee and therefore, currently has no policy regarding compliance with Tenn. Code Ann. §65-21-114(a).

Global NAPS Gulf, Inc. has no suggestions at this time as to how the workshop should proceed.

If you have any questions, or if I can of further assistance in this matter, please do not hesitate to contact me.

Very truly yours,



John O. Postl

BLC

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September 26, 2003

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket No. 03-00502 Workshop to Gather Information from the
Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. 65-
21-114

Dear Director Jones:

Ben Lomand Communications, Inc (d/b/a/ BLC, Inc) provides countywide calling in compliance with Tenn. Code Ann. 65-21-114. We submit our customer information in a timely fashion to the TAR file, maintained by Bell South. Our billing database is continuously compared to this file to insure that all our customers' calls made within their own county are not assessed toll charges.

Our only problems arise when other providers i.e., ISP, Wireless, do not submit their numbers to the TARS file or if they do not compare their billing database to the TARS file.

Our company has no suggestions as to how the proposed workshop should proceed, but offer any support required or requested by the TRA.

An additional copy of this letter is enclosed. Please date stamp and return it in the enclosed stamped, self-addressed Envelope.

Questions regarding this filing may be directed to my attention at 931-668-6601 or via e-mail at jkelsey@blomand.net.

Respectfully,



Judy Kelsey
Operations Manager

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Enclosure: 1

BEN LOMAND COMMUNICATIONS, INC.

1111 New Smithville Highway • P. O. Box 638 • McMinnville, Tennessee 37111

(931) 668-1010

Fax (931) 668-1013

800-522-2955

CT Communications, Inc.
1000 Progress Place, NE
Post Office Box 227
Concord, NC 28026-0227

704-722-2500



September 26, 2003

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Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket No. 03-00502, Workshop to Gather Information from the
Telecommunications Industry Related to Preventing Violations of Tenn. Code
Ann. 65-21-114

Dear Mr. Jones:

This statement is in response to the information request regarding the above-mentioned Docket No. 03-00502. CTC Long Distance Services, Inc. does not presently have any customers it is serving in the State of Tennessee, therefore, is unable to provide any further data at this time that would be beneficial to the workshop.

Should there be any further questions, please contact me at 704.722.2336.

Sincerely,

A handwritten signature in cursive script that reads "Jerry L. Weikle".

Jerry L. Weikle
Director-External Affairs

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EXPRESS PAGING INC.
1113R 12TH AVE SOUTH
NASHVILLE, TN 37203
TEL: 615-242-8770
FAX: 615-242-8703

To:

TENNESSEE REGULATORY AUTHORITY
460 JAMES ROBERTSON PARKWAY
NASHVILLE, TENNESSEE 37243

Attention of the Director, Ron Jones.

REF TO DOCKET NO: 03-00502

IN REF: Workshop and information related to preventing violation
Of Tennessee Code Ann. & 65-21-114

Date: September 26, 2003

We only provide Local Service and we don't bill any call made between two (2) points in the same county in Tennessee.

In our suggestion, all two (2) point call made in the same county suppose to be a toll free with no charge.

Thank you for your effort, asking for a suggestion.



Clement Iguobadia
Vice President

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GTCTELECOM

September 24, 2003

Mr. Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

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TN REGULATORY AUTHORITY

**In Re: Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. §65-21-114
Docket No.: 03-00502**

Dear Mr. Jones:

We are in receipt of your letter dated September 16, 2003, requesting a response to the following inquiries:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.
- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).
- Provide a suggestion for how this workshop should proceed.

Response: GTC Telecom is a long distance switchless reseller who uses two underlying carriers, WorldCom and Sprint, to provide the transmission of phone calls and call detail records. It is our understanding that both WorldCom and Sprint have access to the TAR code database and are able to utilize these codes to flag county-wide calls for their retail customers. However, these carriers have not implemented such a procedure for wholesale customers, including GTC Telecom. Therefore, all 1+ dialing calls (toll calls) are routed to GTC Telecom for rating and billing.

In an effort to comply with Tenn. Code Ann § 65-21-114(a), GTC Telecom has institute a system whereby we manually input the originating NPAXXX and the corresponding terminating NPAXXX that are within the county-wide calling area into our billing system. These intra-county calls are then flagged. Therefore, such calls are not rated and billed to our customers. GTC Telecom makes every effort to flag intra-county calls. However, in cases where a GTC Telecom customer is billed for an intra-county call, GTC Telecom will issue a credit to the customer and input that particular originating NPAXXX and the corresponding terminating NPAXXX into our system so as not to bill such calls in the future.

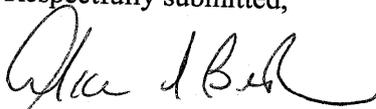
Tennessee Regulatory Authority
September 24, 2003
Page 2

It would be helpful if the Tennessee Regulatory Authority would provide a comprehensive listing of all originating NPAXXX and their corresponding terminating NPAXXX that are within each county-wide calling area. Thus, GTC Telecom would be able to input all affected NPAXXX into our billing system and not bill customers for intra-county calls.

Please acknowledge receipt of this filing by date stamping the extra copy of this correspondence and returning it to me in the enclosed self-addressed prepaid envelope.

If you have any questions or if I may provide you with any additional information, please feel free to contact me at (714) 549-7700.

Respectfully submitted,



Alice S. Breslow
Paralegal

JirehCom, Inc.
3880 N. Main Street, 2nd Floor
East Peoria, IL 61611
Office: 309-694-4590

September 24, 2003

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**RESPONSE TO DOCKET # 03-00502: COMPLIANCE WITH TENN. CODE
ANN. SECTION 65-21-114(a)**

Pursuant to the Notice of Filing letter received by our office on September 22, 2003, JirehCom, a reseller of long-distance telephone service doing business in Tennessee, is exempt from 65-21-114(a). According to sub-section (b), "this section does not apply to any telephone company which is prohibited by federal law from providing countywide service in a particular county." Qwest Communications is one such company, and because JirehCom, Inc. resells only Qwest long-distance service in Tennessee, and provides no other telephone services in Tennessee, the section does not apply to JirehCom, Inc.

Sincerely,



Kevin S. Morge
Director of Operations
JirehCom, Inc.
Office: 309-694-4590, ext. 201

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SEP 29 2003

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